

Daniels County, Montana

**Instructions for using the attached Crosswalk Reference Document
for Review and Submission of Local Mitigation Plans
to the State Hazard Mitigation Officer and FEMA Regional Office**

Attached is a crosswalk reference document, which is based on the Final Draft Report ***State and Local Plan Interim Criteria Under the Disaster Mitigation Act of 2000***, published by FEMA HQ and dated July 11, 2002. This document was based on the *Disaster Mitigation Act of 2000* (P.L. 106-390), enacted October 30, 2000 and *44 CFR Parts 201 and 206 Interim Final Rule*, published February 26, 2002.

The purpose of the crosswalk is to provide a tool to local jurisdictions in developing and submitting Mitigation Plans under Section 322 of the Disaster Mitigation Act of 2000. The crosswalk can be used to assist local or multi-jurisdiction entities in the process of developing and reviewing Local or Multi-jurisdictional plan(s). Each Local or Multi-jurisdictional plan should be reviewed by the pertinent local jurisdictional entity prior to submitting the plan to the respective State. In addition as stated in the Interim Final Rule §201.6(d)(1) "Plans must be submitted to the State Hazard Mitigation Officer for initial review and coordination. The State will then send the plan to the appropriate FEMA Regional Office for formal review and approval." The local jurisdiction must fill out column 3 prior to submitting the plan for formal review and approval.

Tribes may submit hazard mitigation plans through their respective states or they can directly submit their plans to FEMA Region VIII. This means they can write a Local or Multi-jurisdictional Plan as a sub-grantee or they may write a Standard or Enhanced State Plan as a Grantee. When tribes are considering how they want to develop and submit their plans, they need to consider whether or not they want to be Grantees directly from FEMA or Sub-grantees through their respective states. The deciding factor would be how they want to apply for and receive Pre-disaster Mitigation Grant projects, Hazard Mitigation Grant Program projects, or Flood Mitigation Assistance projects. Interested tribes can determine this by talking with their State Hazard Mitigation Officer or their respective FEMA Regional Federal Insurance and Mitigation Administration (FIMA) Division. In any case, each tribe should review their own plans before submitting them to their state or FEMA Regional office.

Following are explanations of each column.

- Column 1 indicates on what page or pages in the *State and Local Plan Interim Criteria* document more detailed information can be found regarding the requirements.
- Column 2 references and directly quotes the *44 CFR Parts 201 and 206 Interim Final Rule*.
- Column 3 is for the tribe and/or local jurisdiction to indicate the Section or Annex and the page number(s) in their plan where the requirement is addressed.
- Column 4 provides space for State/FEMA comments and for scoring of the plan.

Local Mitigation Plan Review and Approval Status

Local Requirement		
Local Plan Submitted to the State by: Fred Gifford MAXIM Technologies	Title: Senior Consultant	Date: July 22, 2003

State Requirement		
State Reviewer: Larry Akers	Title: Montana Hazard Mitigation Officer	Date: July 23, 2003/February 18, 2004 ***

FEMA Requirement		
FEMA Reviewer: Wade Nofziger Marty Kientz Sara Brush	Title: Hazard Mitigation Specialist Hazard Mitigation Specialist Program Specialist	Date: April 4, 2004
Date Received in FEMA Region VIII	February 18, 2004	
Plan Not Approved		
Plan Approved	XXX	
Date Approved	May 12, 2004	

*** Plan was submitted for INFORMAL review and re-submitted as revised.

Point of Contact: Charlie Cahill	Local Plan Reviewed by:	
Title: Daniels County DES Coordinator	Title:	
Agency: Daniels County	NFIP Status (Single Jurisdiction)	
Phone Number: 406/487-2691	Participating <input type="checkbox"/>	Non-Participating <input type="checkbox"/>

Multi-jurisdiction: <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO (If yes, list each jurisdiction below:)	N/A*	NFIP Status (for mapped communities)	
1. Daniels County (never mapped)	<input checked="" type="checkbox"/>	Participating <input type="checkbox"/>	Non-Participating <input type="checkbox"/>
2. Town of Scobey (never mapped)	<input checked="" type="checkbox"/>	Participating <input type="checkbox"/>	Non-Participating <input type="checkbox"/>
3. Town of Flaxville (never mapped)	<input checked="" type="checkbox"/>	Participating <input type="checkbox"/>	Non-Participating <input type="checkbox"/>

LOCAL HAZARD MITIGATION PLAN REVIEW – DANIELS COUNTY, MONTANA
REGION VIII, APRIL 30, 2004 – PAGE 3

LOCAL MITIGATION PLAN SUMMARY WORKSHEET

The plan cannot be reviewed if the prerequisite is not met for a single jurisdictional plan, or prerequisites are not met for a multi-jurisdictional plan.

All mandatory criteria, except those highlighted in gray, must receive a score of “**Satisfactory**” or “**Outstanding**” for the plan to receive FEMA approval. A less than “Satisfactory” score on subsections highlighted in gray will not preclude the plan from passing. Reviewer’s comments must be provided for requirements receiving a “**Needs Improvement**” score.

SCORING SYSTEM

Please check one of the following for each requirement.

U – Unsatisfactory: The plan does not address the criteria.

N – Needs Improvement: The plan addresses the criteria, but needs significant improvement. Reviewer’s comments must be provided.

S – Satisfactory: The plan meets the minimum criteria. Reviewer’s comments are encouraged, but not required.

O – Outstanding: The plan exceeds the minimum criteria. Reviewer’s comments are encouraged, but not required.

Prerequisite (s) (Check Applicable Box)

Adoption by the Local Governing Body:

§201.6(c)(5) **OR**

Multi-jurisdictional Plan Adoption: §201.6(c)(5)
AND

Multi-jurisdictional Participation: §201.6(a)(3)

NOT MET	MET
	X
	X
	X

Planning Process

Documentation of the Planning Process:

§201.6(c)(1)

U	N	S	O
		X	

Risk Assessment

Identifying Hazards: §201.6(c)(2)(i)

Profiling Hazard Events: §201.6(c)(2)(i)

Assessing Vulnerability: Overview: §201.6(c)(2)(ii)

Assessing Vulnerability: Identifying Assets:
§201.6(c)(2)(ii)(A)

Assessing Vulnerability: Estimating Potential
Losses: §201.6(c)(2)(ii)(B)

Assessing Vulnerability: Analyzing Development
Trends: §201.6(c)(2)(ii)(C)

Multi-jurisdictional Risk Assessment:
§201.6(c)(2)(iii)

U	N	S	O
		X	
		X	
		X	
	X		
	X		
		X	
		X	

Mitigation Strategy

Local Hazard Mitigation Goals: §201.6(c)(3)(i)

Identification and Analysis of Mitigation Measures:
§201.6(c)(3)(ii)

Implementation of Mitigation Measures:
§201.6(c)(3)(iii)

Multi-jurisdictional Mitigation Strategy:
§201.6(c)(3)(iv)

U	N	S	O
		X	
		X	
		X	
		X	

Plan Maintenance Procedures

Monitoring, Evaluating, and Updating the Plan:
§201.6(c)(4)(i)

Implementation Through Existing Programs:
§201.6(c)(4)(ii)

Continued Public Involvement: §201.6(c)(4)(iii)

U	N	S	O
		X	
		X	
		X	

Additional State Requirements*

Insert State Requirement

Insert State Requirement

Insert State Requirement

U	N	S	O

LOCAL MITIGATION PLAN APPROVAL STATUS

PLAN NOT APPROVED

PLAN APPROVED

LOCAL HAZARD MITIGATION PLAN REVIEW - DANIELS COUNTY, MONTANA
REGION VIII, APRIL 30, 2004 - PAGE 4

PLAN REVIEW CRITERIA REFERENCE (SECTION PAGE #)	REQUIREMENT AS TAKEN FROM THE INTERIM FINAL RULE PART 201	LOCATION IN THE PLAN (INDICATE SECTION OR ANNEX AND PAGE #)	SCORE / STATE / FEMA REVIEWER COMMENTS <u>SCORING SYSTEM</u> MET/NOT MET (FOR PREREQUISITE (S) ONLY) U--UNSATISFACTORY N--NEEDS IMPROVEMENT	S--SATISFACTORY O--OUTSTANDING
PREREQUISITE (S) (3-1)			<i>NOTE: The prerequisite, or prerequisites in the case of multi-jurisdictional plans, must be met before the plan can be approved.</i>	
Adoption by the Local Governing Body (3-2)	Requirement §201.6(c)(5): [The local hazard mitigation plan shall include] documentation that the plan has been formally adopted by the governing body of the jurisdiction requesting approval of the plan (e.g., City Council, County Commissioner, Tribal Council)...	Appendix A	S	Met Requirement.
OR				
Multi-Jurisdictional Plan Adoption (3-3)	Requirement §201.6(c)(5): For multi-jurisdictional plans, each jurisdiction requesting approval of the plan must document that it has been formally adopted.	Appendix A	S	The plan was adopted by the various jurisdictions.
AND				
Multi-Jurisdictional Planning Participation (3-4)	Requirement §201.6(a)(3): Multi-jurisdictional plans (e.g., watershed plans) may be accepted ... Statewide plans will not be accepted as multi-jurisdictional plans.	Section 2.0 Appendix B	S	Well documented. More public involvement is needed in future revisions. Good job.

PLAN REVIEW CRITERIA REFERENCE (SECTION PAGE #)	REQUIREMENT AS TAKEN FROM THE INTERIM FINAL RULE PART 201	LOCATION IN THE PLAN (INDICATE SECTION OR ANNEX AND PAGE #)	SCORE / STATE / FEMA REVIEWER COMMENTS <u>SCORING SYSTEM</u> MET/NOT MET (FOR PREREQUISITE (S) ONLY) U--UNSATISFACTORY S--SATISFACTORY N--NEEDS IMPROVEMENT O--OUTSTANDING
PLANNING PROCESS (3-5)			
Documentation of the Planning Process (3-6)	Requirement §201.6(c)(1): [The plan must document] the planning process used to develop the plan, including how it was prepared, who was involved in the process, and how the public was involved.	Section 2.0 Appendix B	S The planning process was well documented through the use of public meetings, stakeholder interviews, and sign up sheets, etc. Good job.
RISK ASSESSMENT (3-9)			
Identifying Hazards (3-10)	Requirement §201.6(c)(2)(i): [The risk assessment shall include a] description of the type...of all natural hazards that can affect the jurisdiction...	Section 3.1, 3.2 Pp 9, 25	S Hazards are identified by the local government and the public. Pg. 9 lists general hazards and Pg. 25 lists the priority hazards.
Profiling Hazard Events (3-14)	Requirement §201.6(c)(2)(i): Description of the...location and extent of all natural hazards that can affect the jurisdiction. The plan shall include information on previous occurrences of hazard events and on the probability of future hazard events.	Section 3.1, 3.2, 3.4	S Hazard profiles are provided for each hazard. Various sources were cited, including original newspaper articles. However, some of the data was too general to be useful, as it occurred in other parts of the state. Therefore, relevance and link of that data should be explained. The tables in Section 3 include an estimate of frequency and magnitude of potential events.

PLAN REVIEW CRITERIA REFERENCE (SECTION PAGE #)	REQUIREMENT AS TAKEN FROM THE INTERIM FINAL RULE PART 201	LOCATION IN THE PLAN (INDICATE SECTION OR ANNEX AND PAGE #)	SCORE / STATE / FEMA REVIEWER COMMENTS <u>SCORING SYSTEM</u> MET/NOT MET (FOR PREREQUISITE (S) ONLY) U--UNSATISFACTORY S--SATISFACTORY N--NEEDS IMPROVEMENT O--OUTSTANDING
Assessing Vulnerability: Overview (Currently found under Identifying Assets section, p.3-18—to be corrected in next version of the <i>Plan Criteria</i>)	Requirement 201.6(c)(2)(ii): [The risk assessment shall include a] description of the jurisdiction's vulnerability to the hazards described in paragraph (c)(2)(i) of this section. This description shall include an overall summary of each hazard and its impact on the community.	Section 3.3	S Good use of maps and tables to detail the information. Each hazard summary in Section 3 contains information on impacts to the community. The tables illustrate the vulnerability of each community to all high priority hazards identified above. For future reference, HAZUS MH provides census block level data.
Assessing Vulnerability: Identifying Assets (3-18)	Requirement 201.6(c)(2)(ii)(A): The plan should describe vulnerability in terms of: The types and numbers of existing and future buildings, infrastructure, and critical facilities located in the identified hazard areas...	Section 3.3 Appendix C	N There are no direct estimates of the number of buildings within the hazard areas. The critical facilities are listed, but the location of these facilities in regard to the hazard areas is not described. The exposure of critical facilities is addressed in the vulnerability tables in Section 3.3, but the specific facility is not identified. This identification is important in establishing a good idea of vulnerability for the specific structures at risk, i.e. the vulnerability might be different based on the type of critical facility. Also, to fully meet this requirement, "future" losses must be addressed. <i>Note: A less than "Satisfactory" score on this requirement will not preclude the plan from passing</i>

PLAN REVIEW CRITERIA REFERENCE (SECTION PAGE #)	REQUIREMENT AS TAKEN FROM THE INTERIM FINAL RULE PART 201	LOCATION IN THE PLAN (INDICATE SECTION OR ANNEX AND PAGE #)	SCORE / STATE / FEMA REVIEWER COMMENTS <u>SCORING SYSTEM</u> MET/NOT MET (FOR PREREQUISITE (S) ONLY) U--UNSATISFACTORY S--SATISFACTORY N--NEEDS IMPROVEMENT O--OUTSTANDING
Assessing Vulnerability: Estimating Potential Losses (3-22)	Requirement 201.6(c)(2)(ii)(B): [The plan should describe vulnerability in terms of an] estimate of the potential dollar losses to vulnerable structures identified in paragraph (c)(2)(i)(A) of this section and a description of the methodology used to prepare the estimate...	Section 3.5	N The vulnerability tables present potential losses by estimating exposure and risk to buildings, as well as societal risk. The methods used are clearly explained, but the potential for future losses is not specifically addressed. <i>Note: A less than “Satisfactory” score on this requirement will not preclude the plan from passing.</i>
Assessing Vulnerability: Analyzing Development Trends (3-24)	Requirement 201.6(c)(2)(ii)(C): [The plan should describe vulnerability in terms of] providing a general description of land uses and development trends within the community so that mitigation options can be considered in future land use decisions.	Section 3.3.3	S This is a rural area with limited population and resources. They indicate that the overall County population has declined by 11% and that no growth is occurring or planned in the identified hazard areas. They also specifically describe one proposed project that is not in an identified hazard area. <i>Note: A less than “Satisfactory” score on this requirement will not preclude the plan from passing.</i>
Multi-Jurisdictional Risk Assessment (3-26)	Requirement §201.6(c)(2)(iii): For multi-jurisdictional plans, the risk assessment section must assess each jurisdiction’s risks where they vary from the risks facing the entire planning area.	Tables 3-9 thru 3-11	S The vulnerability tables include an assessment of each jurisdiction seeking plan approval. However, the plan lists over \$3 million in property at flood risk, yet the county does not participate in the NFIP. We suggest the county reviews this before the next update, so their citizens can obtain the protection offered by flood insurance.

PLAN REVIEW CRITERIA REFERENCE (SECTION PAGE #)	REQUIREMENT AS TAKEN FROM THE INTERIM FINAL RULE PART 201	LOCATION IN THE PLAN (INDICATE SECTION OR ANNEX AND PAGE #)	SCORE / STATE / FEMA REVIEWER COMMENTS <u>SCORING SYSTEM</u> MET/NOT MET (FOR PREREQUISITE (S) ONLY) U--UNSATISFACTORY S--SATISFACTORY N--NEEDS IMPROVEMENT O--OUTSTANDING
MITIGATION STRATEGY (3-29)			<i>Note: Any changes made in the risk assessment to address previous unsatisfactory or needs improvement scores, will need to be reflected in the Mitigation Strategy section to gain final approval of the plan.</i>
Local Hazard Mitigation Goals (3-30)	Requirement §201.6(c)(3)(i): [The hazard mitigation strategy shall include: a] description of mitigation goals to reduce or avoid long-term vulnerabilities to the identified hazards.	Section 4.1	S They have good goals for the county; however, as there is limited mitigation planned, they should include more "mitigation" projects into their 5-year update.
Identification and Analysis of Mitigation Measures (3-34)	Requirement §201.6(c)(3)(ii): Section that identifies and analyzes a comprehensive range of specific mitigation actions and projects being considered to reduce the effects of each hazard, with particular emphasis on new and existing buildings and infrastructure.	Sections 4.1, 4.2, 4.3 and Appendix D	S A broad range of potential mitigation strategies and actions are considered. The scope of these strategies includes response related improvements.
Implementation of Mitigation Measures (3-36)	Requirement §201.6(c)(3)(iii): [Action plan describing how the actions... prioritized... special emphasis... a cost benefit review of the proposed projects and their associated costs.	Sections 4.3 and 4.4, pg 40	S Section 4.3 describes how projects were prioritized and how cost-benefit was emphasized. The benefit includes impacts on people and property. In addition to the matrix for scoring, in Table 4-1, the county DES coordinator and the LEPC applied high, medium and low rankings. Project implementation is described in Section 4.4 and the LEPC and DES coordinators play significant roles.

PLAN REVIEW CRITERIA REFERENCE (SECTION PAGE #)	REQUIREMENT AS TAKEN FROM THE INTERIM FINAL RULE PART 201	LOCATION IN THE PLAN (INDICATE SECTION OR ANNEX AND PAGE #)	SCORE / STATE / FEMA REVIEWER COMMENTS <u>SCORING SYSTEM</u> MET/NOT MET (FOR PREREQUISITE (S) ONLY) U--UNSATISFACTORY N--NEEDS IMPROVEMENT S--SATISFACTORY O--OUTSTANDING	
Multi-jurisdictional Mitigation Strategy (3-40)	Requirement §201.6(c)(3)(iv): For multi-jurisdictional plans, there must be identifiable action items specific to the jurisdiction requesting FEMA approval or credit of the plan.	Table 4.2	S	All jurisdictions seeking plan approval have identifiable action items in the mitigation strategy. All communities seeking plan approval have clearly demonstrated their willingness to pursue actions in the mitigation strategy.
PLAN MAINTENANCE PROCEDURES (3-43)				
Monitoring, Evaluating, and Updating the Plan (3-44)	Requirement §201.6(c)(4)(i): Method and schedule of monitoring, evaluating, and updating the mitigation plan within a five-year cycle.	Section 5.1	S	Documentation indicates that the county will review the plan annually.
Implementation Through Existing Programs (3-48)	Requirement §201.6(c)(4)(ii): Process...incorporate the requirements... comprehensive or capital improvement plans, when appropriate...	Section 5.2	S	The county is developing a “Comprehensive Growth Policy” and building codes. The plan indicates that local officials will work with county departments to ensure that mitigation projects are consistent with planning goals.
Continued Public Involvement (3-50)	Requirement §201.6(c)(4)(iii): Discussion on how the community will continue public participation in the plan maintenance process.	Section 5.3	S	The plan states that the public will be included in the update process, with a copy of the plan being held in various departments and at the Public Library.